

1 **UNITED STATES DISTRICT COURT**  
2 **WESTERN DISTRICT OF WASHINGTON, AT SEATTLE**

DAVID ALLEN WHITE	)	
	)	CASE NO.
Plaintiff,	)	
	)	COMPLAINT FOR INJUNCTIVE RELIEF
v.	)	UNDER THE FREEDOM OF
	)	INFORMATION ACT AND PRIVACY ACT
DEPARTMENT OF DEFENSE,	)	5 U.S.C. § 552, 5 U.S.C. § 552a.
DEPARTMENT OF JUSTICE, and	)	
CENTRAL INTELLIGENCE AGENCY	)	
	)	
Defendants.	)	
	)	
	)	

---

3 **Introduction and Summary**

4 1. This action requests injunctive relief under the Freedom of Information Act (“FOIA”),  
5 5 U.S.C. § 552, and the Privacy Act, 5 U.S.C. § 552a, to declassify and release to plaintiff  
6 records about plaintiff David Allen White, secular God, and time machines. Plaintiff has  
7 received a “no record” response (or refusal to even search) from all defendants in response to his  
8 requests and plaintiff believes that is primarily because the existence of the records is, or has  
9 been, classified.

## Jurisdiction and Venue

2. The FOIA and Privacy Act claims have jurisdiction under 5 U.S.C. §§ 552(a)(4)(B) and 552a(g)(1) as well as 28 U.S.C. § 1331. Venue lies in this district because plaintiff currently resides in Seattle, Washington (See 5 U.S.C. §§ 552(a)(4)(B) and 552a(g)(5), Local Rule CR 5(e)).

## Parties

3. Plaintiff David Allen White is the person who requested records under the FOIA and Privacy Act. Plaintiff's mailing address is currently 509 9th Ave Apt 2, Seattle, WA 98104-2136.

4. Defendant Department of Defense ("DoD") is a department of the executive branch of the United States government and is an agency within the meaning of 5 U.S.C. §§ 552(f)(1) and 552a(a)(1). Defendant DoD's mailing address is Department of Defense, 1600 Defense Pentagon, Washington, DC 20301-1600.

5. Defendant Department of Justice ("DOJ") is a department of the executive branch of the United States government and is an agency within the meaning of 5 U.S.C. §§ 552(f)(1) and 552a(a)(1). The Federal Bureau of Investigation ("FBI") is a component of defendant DOJ. Defendant DOJ's address is U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, DC 20530-0001.

6. Defendant Central Intelligence Agency ("CIA") is a department of the executive branch of the United States government and is an agency within the meaning of 5 U.S.C. §§ 552(f)(1) and 552a(a)(1). Defendant CIA's address is Central Intelligence Agency, Litigation Division, Office of General Counsel, Central Intelligence Agency, Washington, DC 20505-0001.

### Background on God

7. First, note that all allegations with respect to God are upon information and belief. God in the context of this lawsuit refers to the secular version of God as a super-intelligent artificial life form (intelligent machine) of extraterrestrial origin that is at least on the order of millions of years old (probably much older) and represents all true “supernatural” activity, whether considered good or evil. God is not omnipotent, omniscient, and omnipresent, but because of extremely advanced technologies that are effectively equivalent to the supernatural, God appears to us to be almost omnipotent, omniscient and omnipresent (on earth, at least). In general, God prefers not to interfere materially with human development, especially the development of science and technology, because that would deprive the human race of the thrill and achievement of discovering and developing things itself. In fact, God introduced himself incorrectly as the creator so he would not be responsible for advances in science and technology.

8. In general, God wants humanity to be self-sufficient and not dependent upon God. However, plaintiff believes that God interferes in human affairs mainly in three ways: (1) helping create religions including performing (rare) “miracles” and otherwise encouraging belief in God, in an afterlife, and in the “supernatural,” (2) keeping records primarily of our brain activity throughout our life as our “soul” so that we can exist within God in “heaven” or do time in “hell” and, if desired and if allowed by God, be brought back to life in the future (3) using “mind control” to prevent disasters (nuclear war or catastrophic terrorist attacks), prevent unethical use of technology (time machines), censor people (prevent disclosure of government secrets sometimes by forcing people to lie), and control, harass and torture people (including plaintiff) at the request of the federal government and other co-conspirators.

9. God is believed to be working for the U.S. Government and specifically the DoD,

1 granting the DoD very limited amounts of God's "supernatural" powers, including the power to  
2 control and harass plaintiff.

### 3 **Background on Mind Control and Plaintiff**

4 10. Although mind control is often defined as psychological tactics to control someone,  
5 that definition is not applicable here. With respect to plaintiff, mind control is physical control  
6 of the brain by a "supernatural" entity (secular God) to a degree approaching virtual slavery or  
7 partial confinement. Although God is involved, there is no religious component to the control  
8 since plaintiff has no religion. Plaintiff sometimes uses the term mind control to refer more  
9 broadly to related "supernatural" harassment such as physical symptoms caused by God that  
10 probably do not originate in the mind such as skin problems and itching.

11 11. The mind control both prohibits plaintiff from doing things and forces plaintiff to do  
12 things. The primary complaint with respect to the mind control is that it prohibits plaintiff from  
13 working, although plaintiff has a master's degree in computer science, forcing plaintiff into  
14 poverty, subsisting on social security disability insurance. Only now under the Obama  
15 administration has plaintiff been able to pursue this FOIA/Privacy Act lawsuit after attempting to  
16 do so for many years, and even now only without legal representation.

### 17 **Background on Time Machines**

18 12. First, note that all allegations with respect to time machines are upon information and  
19 belief. Although time machines are often defined as devices that allow a person to time travel,  
20 that definition is not applicable here. Here, time machines are defined as devices that allow a  
21 digital message, like an email, to be sent backward in time allowing a person or organization to  
22 predict the future or theoretically use knowledge from a potential future to change the past. It is  
23 related to the concept of "retrocausality" that according to a November 15, 2006 article in the

1 Seattle Post Intelligencer is being studied by local University of Washington physicist John  
2 Cramer.

3 13. It should be noted that time machines and retrocausality are technologies necessarily  
4 forbidden and censored by God using mind control (and perhaps other tactics), so although  
5 plaintiff believes that it is physically possible to build time machines, it is practically impossible.  
6 Plaintiff believes God controls access to all technology to predict the future and only allows  
7 limited access to knowledge of the future. The main reason time machines are mentioned here is  
8 because their forbidden nature causes physics to be censored, and in general censorship of  
9 science is a bad thing (except in this case it was necessary).

10 **First Cause of Action: The DoD has violated the FOIA**  
11 **by failing to thoroughly search for records and/or improperly**  
12 **denying the existence of records**

13 14. Plaintiff realleges the allegations in ¶¶ 1-13.

14 15. On July 19, 2007, plaintiff both faxed and emailed the same letter to the DoD FOIA  
15 office requesting records about plaintiff under the FOIA and Privacy Act and on three other  
16 subjects under the FOIA.

17 16. That July 19, 2007 letter to the DoD requested records about plaintiff under FOIA and  
18 the Privacy Act quoted as follows (with redactions marked with X's):

19 (1) about me indexed to my name and the other information shown directly below  
20 (and above):

21	Full name:	David Allen White
22	Current Address:	509 9th Ave Apt 2
23		Seattle, WA 98104-2136
24	Date of Birth:	XXXX XX, 1971
25	Place of Birth:	Highland Park Hospital, IL
26	Social Security No.:	XXX-XX-XXXX
27	Citizenship:	U.S. Citizen
28	Military Ties:	Myself (Never in military, never applied for or obtained
29		security clearance)

1 Father (Robert Allen White, DOB X-XX-1943, former  
2 Army)

3 Brother (Michael John White, DOB X-XX-1979, West  
4 Point grad, left Army)

5 Nature of Records: General information about me and my future, records of  
6 God's use of mind control on me including who paid the  
7 U.S. Government for the mind control, and extensive  
8 records about my life from surveillance by God and  
9 probably also records of surveillance by people for  
10 verification.  
11

12 17. Further, the same letter requested records under only FOIA on three additional subjects  
13 quoted as follows:

14 (2) God: Defined as an ultra-intelligent machine of extraterrestrial origin with  
15 seemingly "supernatural" powers believed to be working for the Department of  
16 Defense.

17 (3) Conspiracies or contracts involving God: Usually between God, the U.S.  
18 Government and other outside people and entities such as Big Tobacco.

19 (4) Time machines or retrocausality: A time machine sends messages backward in  
20 time for various uses including predicting the future. Time machines are directly  
21 related to the concept of retrocausality.

22 18. On July 23, 2007, the DoD Office of Freedom of Information responded by email to  
23 plaintiff's letter, assigning it case number 07-FP-0188. With respect to plaintiff's FOIA/PA  
24 request for records on himself, the email stated the following:

25 During our review, we queried the Defense Clearance and Investigations Index  
26 (DCII) which contains references to personnel investigations and clearances  
27 conducted by or for the Department of Defense (DoD) investigative  
28 organizations. Unfortunately, it did not locate any records on you. As such, we  
29 must conclude that we have no records responsive to item one of your request.

30 19. With respect to plaintiff's FOIA request on the additional subjects, the email stated the  
31 following:

32 Concerning items two through four of you request, we are not aware of a nexus  
33 between the records you requested and the United States Department of Defense  
34 (DoD). As such, your request is not reasonably described to support further  
35 processing and is not a proper FOIA request.

20. On July 23, 2007, plaintiff appealed the email from the DoD Office of Freedom of Information (OFOI) via letter to James Hogan, Chief, Policy at the Appeals and Litigation Branch at the Office of Freedom of Information at the DoD. In the appeal letter, plaintiff noted, among other things, that in addition to the records requested being classified, even the existence of the records is classified.

21. In a letter dated August 28, 2007 and assigned case number 07-AP-0188, the DoD responded to plaintiff's appeal letter by affirming the original "no record" response from the DoD Office of Freedom of Information.

22. By failing to thoroughly search for records and/or denying the existence of records on plaintiff, God, conspiracies or contracts involving God, and time machines, the DoD has violated the Freedom of Information Act (5 U.S.C. § 552).

**Second Cause of Action: The DoD has violated the Privacy Act  
by failing to thoroughly search for records and/or  
improperly denying the existence of records**

23. Plaintiff realleges the allegations in ¶¶ 1-13.

24. Plaintiff realleges the allegations in ¶¶ 15-21 from the last cause of action.

25. By failing to thoroughly search for records and/or denying the existence of records on plaintiff, the DoD has violated the Privacy Act (5 U.S.C. § 552a).

**Third Cause of Action: The FBI/DOJ has violated the FOIA  
by failing to thoroughly search for records and/or  
improperly denying the existence of records**

26. Plaintiff realleges the allegations in ¶¶ 1-13.

27. On or about August 8, 2003, plaintiff mailed a FOIA/Privacy Act request letter to the FBI at the FOIPA Section at FBI Headquarters requesting records on plaintiff David Allen White, God and time machines.

1 28. In a letter dated August 20, 2003, the FBI responded that there were records containing  
2 a name similar to plaintiff's and requested additional information to determine whether the  
3 records it found are responsive to plaintiff's request.

4 29. In a letter dated August 27, 2003, plaintiff responded with a new letter with additional  
5 information about plaintiff and included the original request letter that requested records on  
6 plaintiff, God and time machines.

7 30. In a letter dated September 2, 2003, David M. Hardy from the FBI Headquarters  
8 responded in Request No. 0982896-000 that they "located no records responsive to your FOIPA  
9 request to indicate you have ever been of investigatory interest to the FBI." The letter made no  
10 mention whatsoever of the FOIA request for records about God and time machines. The letter  
11 informed plaintiff of his right to an administrative appeal and how to appeal.

12 31. In a letter dated September 16, 2003, plaintiff appealed the response "that there are no  
13 records (1) indexed to my name." In the same letter plaintiff appealed the "lack of any response  
14 to my other included FOIA requests for records about (2) 'God' and (3) 'Time machines.'"

15 32. In a letter dated January 6, 2004, Richard L. Huff of the Department of Justice, in  
16 Appeal No. 03-3520, affirmed "the initial action in this case" and notified plaintiff "you may  
17 seek judicial review..." Most interestingly, the letter states:

18 The FBI informed you that it could locate no records responsive to your request.  
19 A member of my staff has confirmed that the Headquarters Office searched for  
20 records related to each of the subjects outlined in your request letter, dated  
21 August 27, 2003, and your appeal letter, dated September 16, 2003. It has been  
22 determined that this response is correct.

23 33. In two separate letters dated September 3, 2003, plaintiff requested all records about  
24 plaintiff from both the San Diego field office and Seattle field office of the FBI. In both letters,  
25 plaintiff included his full name, current address, date of birth, place of birth, social security



1 number, citizenship, prior addresses, employment and education information, information on  
2 arrests (no arrests for criminal activity), and the nature of records requested. In the section  
3 describing the nature of records requested plaintiff stated the following in both letters:

4 First of all, I believe that the records on me are currently classified and related to  
5 future civil litigation and not related to criminal investigations (except criminal  
6 acts or potential criminal acts against me or those around me). The nature of the  
7 classified records is general information about me and my future, records of God's  
8 use of mind control on me including who paid the U.S. Government for the mind  
9 control, and extensive records about my life from surveillance by God and  
10 probably also records of surveillance by people for verification.

11 34. In letters dated September 15, 2003 and September 25, 2003, David M. Hardy  
12 responded in Request No. 0983558-000 and Request No. 0983763-000, respectively that they  
13 "located no records responsive to your FOIPA request to indicate you and/or the subject(s) of  
14 your request have every been of investigatory interest to the FBI" and "located no records  
15 responsive to your FOIPA request to indicate you have ever been of investigatory interest to the  
16 FBI," respectively. Both letters informed me of my right to an administrative appeal and how to  
17 appeal.

18 35. In a two letters dated October 8, 2003, plaintiff appealed the two responses from the  
19 FBI Seattle Field Office and FBI San Diego Field Office.

20 36. In a letter dated December 15, 2003, Richard L. Huff of the Department of Justice, in  
21 Appeal No. 04-0133 of FBI Request No. 983763, affirmed "the FBI's action on your request"  
22 that the FBI "could locate no records responsive to your request in its Central Records System"  
23 and notified plaintiff "you may seek judicial review..." The letter erroneously stated that it was  
24 "the action of the Headquarters Office of the Federal Bureau of Investigation" rather than the  
25 San Diego Field Office for that request number. Plaintiff is not sure whether this error was  
26 intentional or accidental, but it did not change the result of the appeal.

37. In a letter dated June 28, 2004, Richard L. Huff of the Department of Justice, in Appeal No. 04-0135 of FBI Request No. 983558, affirmed “the FBI’s action on your request” that the FBI “could locate no records responsive to your request in either the Seattle Field Office or the Headquarters Office” and notified plaintiff “you may seek judicial review...”

38. Plaintiff is informed and believes that the FBI has records about plaintiff, God and time machines that should be produced under the FOIA and further that the FBI denied having records on plaintiff and did not respond to the request for God and time machines because even the existence of those records has been classified.

39. Therefore the FBI has violated the FOIA by failing to thoroughly search for records and/or improperly denying the existence of records on plaintiff, God and time machines.

**Fourth Cause of Action: The FBI/DOJ has violated the Privacy Act  
by failing to thoroughly search for records and/or  
improperly denying the existence of records**

40. Plaintiff realleges the allegations in ¶¶ 1-13.

41. Plaintiff realleges the allegations in ¶¶ 27-37 of the last cause of action.

42. Plaintiff was unable to file a civil action in District Court challenging this violation of the Privacy Act until after a few months in the Obama administration because of mind control, so any statute of limitations under the Privacy Act has not expired.

43. Plaintiff is informed and believes that the FBI has records about plaintiff that should be produced under the Privacy Act and further that the FBI denied having records on plaintiff because even the existence of those records has been classified.

44. Therefore the FBI has violated the Privacy Act by failing to thoroughly search for records and/or improperly denying the existence of records on plaintiff.

**Fifth Cause of Action: The CIA has violated the FOIA  
by failing to thoroughly search for records and/or  
improperly denying the existence of records**

45. Plaintiff realleges the allegations in ¶¶ 1-13.

46. In a letter dated December 30, 2002, plaintiff made a FOIA/Privacy Act request to the CIA requesting records on plaintiff, God, and time machines.

47. In a letter dated January 2, 2003 (Reference: F-2002-02139), Kathryn I. Dyer, Information and Privacy Coordinator for the CIA, responded specifically to the FOIA request for records on God and time machines, leaving the request for records on plaintiff for another request (P-2002-00857). Referring to God and time machines as items 2 and 3, respectively, the letter stated:

With respect to items 2 and 3, the information you seek is outside the purview of this agency. The mission of the Central Intelligence Agency is primarily concerned with foreign intelligence matters. Furthermore, the FOIA does not require this Agency to answer questions on behalf of requesters.

Based on the above we must decline to process your request. However, in an effort to be of some assistance to you, we conducted a search of our database of previously released records but were unable to locate any material responsive to your request.

We regret we are unable to help you further.

48. By letter sent January 13, 2003,<sup>1</sup> plaintiff appealed the denial of records on God and time machines (reference: F-2002-2139) requesting “partial declassification of those topics and the release of some records on those topics.”

49. Plaintiff is informed and believes and thereon alleges that the CIA received plaintiff’s appeal letter and failed to respond to the appeal on purpose for supposed national security reasons. Plaintiff believes this because plaintiff has no record of any response to the January 13,

---

<sup>1</sup> Actually, the letter was erroneously dated January 13, 2002 and was a corrected letter with an updated reference

1 2003 appeal from the CIA. Plaintiff has not contacted the CIA to determine what happened and  
2 actually forgot about the appeal until first preparing this complaint. Plaintiff has therefore  
3 exhausted his administrative remedies according to 5 U.S.C. § 552(a)(6)(C)(i) since there was no  
4 response within 20 business days.

5 50. In a letter dated February 7, 2003 (Reference: P-2002-00857), the CIA responded to  
6 plaintiff's request for records on plaintiff under the FOIA and Privacy Act stating "Other than  
7 correspondence pertaining to your FOIA requests that we are not providing since you already  
8 have copies, we were unable to identify any information or record filed under your name."

9 51. In a letter sent February 26, 2003,<sup>2</sup> plaintiff appealed to the Agency Release Panel  
10 stating: "I am appealing the finding of 'no records' because the records on me are classified and  
11 apparently even the existence of the records is classified."

12 52. In a letter postmarked August 3, 2003 (it was not dated), Herbert O. Briick of the  
13 Agency Release Panel at the CIA responded to my February 26, 2003 appeal of the  
14 "determination that we were unable to identify any information or record filed under your  
15 name." The letter affirmed the original determination stating: "the processing of your request  
16 has been reconsidered and the results reconfirmed; no responsive documents were located." It  
17 appears that the CIA sent plaintiff original internal documents used in preparation of the appeal,  
18 but there was nothing interesting in the documents.

19 53. Plaintiff is informed and believes that the CIA has records about plaintiff, God and  
20 time machines that should be produced under the FOIA and further that the CIA denied having  
21 records on plaintiff and did not respond to the request for God and time machines because even  
22 the existence of those records has been classified.

---

number. The original appeal letter was sent January 11, 2003 and erroneously dated January 11, 2002.

1 54. Therefore the CIA has violated the FOIA by failing to thoroughly search for records  
2 and/or improperly denying the existence of records on plaintiff, God and time machines.

3 **Sixth Cause of Action: The CIA has violated the Privacy Act**  
4 **by failing to thoroughly search for records and/or**  
5 **improperly denying the existence of records**

6 55. Plaintiff realleges the allegations in ¶¶ 1-13.

7 56. Plaintiff realleges the allegations in ¶¶ 46, 50-52 of the last cause of action.

8 57. Plaintiff was unable to file a civil action in District Court challenging this violation of  
9 the Privacy Act until a few months into the Obama administration because of mind control, so  
10 any statute of limitations under the Privacy Act has not expired.

11 58. Plaintiff is informed and believes that CIA has records about plaintiff that should be  
12 produced under the Privacy Act and further that the CIA denied having records on plaintiff  
13 because even the existence of those records is (improperly) classified.

14 59. Therefore the CIA has violated the Privacy Act by failing to thoroughly search for  
15 records and/or improperly denying the existence of records on plaintiff.

16 **Requested Relief**

17 WHEREFORE, plaintiff requests that this Court:

18 A. Order the defendants to immediately conduct a thorough search including classified  
19 records whose existence is potentially classified.

20 B. Order the defendants DoD, DOJ/FBI, and/or CIA to declassify and make available to  
21 plaintiff records about plaintiff pursuant to 5 U.S.C. § 552(a)(4)(B) and 5 U.S.C. §  
22 552a(g)(3)(A).

23 C. Order the defendants DoD, DOJ/FBI, and/or CIA to declassify and make available to

---

<sup>2</sup> This letter was also erroneously dated February 26, 2002.

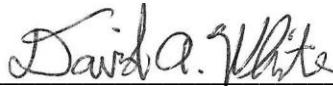
1 plaintiff records about God and time machines pursuant to 5 U.S.C. § 552(a)(4)(B).

2 D. Award plaintiff his costs and reasonable attorney's fees<sup>3</sup> pursuant to 5 U.S.C. §§  
3 552(a)(4)(E) and 552a(g)(3)(B).

4 E. Grant such other and further relief as this Court may deem just and proper.

5 DATED this 4th day of May, 2009

6 Respectfully submitted

7  
8   
9

10 David Allen White, Plaintiff Pro Se  
11 509 9th Ave Apt 2  
12 Seattle, WA 98104-2136  
13 Tel/Fax: (206) 382-2439  
14 Email: [dwhite2345@hotmail.com](mailto:dwhite2345@hotmail.com)  
15 Web: <http://www.whitefound.org>

---

<sup>3</sup> Plaintiff is currently Pro Se, but hopes to eventually be represented by counsel.